

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

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In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

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)  
) Chapter 11  
)  
) Case No. 23-00623 (TJC)  
)  
) Jointly Administered  
)  
) **Related to Docket No. 259**

**STAFFING REPORT OF TONEYKORF PARTNERS, LLC FOR  
THE PERIOD FROM MAY 1, 2024 THROUGH MAY 31, 2024**

In accordance with the *Order Authorizing Debtors to Retain ToneyKorf Partners, LLC as Interim Management of the Debtors, Effective as of the Petition Date Pursuant to Section 363 of the Bankruptcy Code, and Granting Related Relief* [Docket No. 259] (the “Retention Order”) and pursuant to the terms of the engagement letter dated March 30, 2023 (the “Engagement Letter”), ToneyKorf Partners, LLC (“ToneyKorf Partners”) hereby submits its staffing report (the “Staffing Report”) for the period of May 1, 2024 through May 31, 2024 (the “Staffing Period”), and in support of such report respectfully represents:

1. The Debtors appointed Mark E. Toney to serve as the Chief Restructuring Officer, James R. Porter to serve as the Chief Financial Officer, and Christopher P. Karambelas to serve as the Chief Information Officer and Chief Operating Officer as set forth in the Engagement Letter. The Engagement Letter further states that ToneyKorf Partners will provide additional personnel to assist Mr. Toney, Mr. Porter, and Mr. Karambelas with the restructuring efforts and other business of the Debtors (the “Temporary Staff”), as set forth more fully in the Engagement Letter.

2. The Retention Order provides that ToneyKorf Partners shall file with this Court a report of staffing on the engagement for the previous month and provide notice to the U.S. Trustee

and any official committee. *See* Retention Order, ¶ 3(c). Such report shall include the names of and functions filled by the individuals assigned. *See id.*

3. Attached hereto as **Exhibit A** is a list which includes the names of the ToneyKorf Partners personnel serving the Debtors during this Staffing Period, along with their corresponding functions.

Dated: June 20, 2024

/s/ Mark E. Toney

Mark E. Toney  
Senior Managing Director  
ToneyKorf Partners, LLC

**EXHIBIT A**

**ToneyKorf Partners, LLC  
Staffing Report  
May 1, 2024 – May 31, 2024**

| <b>Professional</b> | <b>Title</b>             | <b>Function</b>   |
|---------------------|--------------------------|---|
| Mark Toney          | Senior Managing Director | <ul style="list-style-type: none"> <li>– Chief Restructuring Officer</li> <li>– Oversees and leads aspects of the Debtors’ wind-down and post-sale operations</li> <li>– Supports governing bodies (Boards) of the Debtors and affiliates</li> <li>– Leads the restructuring, asset sales, liability assessments, and planning of the Debtors</li> <li>– Participates in the development of the Plan of Liquidation and the Disclosure Statement, and related negotiations</li> <li>– Reviews and assesses the liquidation analysis, waterfalls, and potential distributions to creditors per the Plan</li> <li>– Attends and coordinates negotiations with stakeholders and prepares for, participates, and testifies in the court hearing regarding the Plan</li> <li>– Reviews and directs asset recovery and administrative claims analysis</li> <li>– Coordinates the sale process for the joint ventures, including due diligence, discussions with key parties, and coordinating review of the companies</li> <li>– Oversees and reviews cash management for disbursements and uses of cash for allocation between items pre- and post-transaction and the responsible party for the payments</li> <li>– Assists counsel with objections and litigations by key stakeholders</li> <li>– Oversees communications between the Debtors and certain key stakeholders</li> <li>– Reviews workers’ compensation plans and coordinates strategy for wind-down of the trust</li> <li>– Begins transition planning to hand over operations and bankruptcy matters post-confirmation to Liquidating Trustee</li> </ul> |
| James Porter        | Managing Director        | <ul style="list-style-type: none"> <li>– Chief Financial Officer</li> <li>– Manages the Debtors’ financial and treasury functions, including coordinating cash flow efforts, overseeing budget and actual cash flow, and other needs as necessary</li> <li>– Provides oversight of bankruptcy reporting</li> <li>– Collaborates and supports the asset sale process of the remaining additional assets (accounts receivable, joint ventures, Real Estate)</li> <li>– Oversees, plans, and assists with certain aspects of the Debtors’ wind-down and post-sale operations, including accounts receivable collections and planning for the transition of revenue cycle management, billing, and follow-up vendors</li> <li>– Oversees communication with Bondholders’, Unsecured Creditors’, and Pension Committee advisors and participates in negotiations with the same parties regarding the Plan of Liquidation and Disclosure Statement</li> <li>– Analyzes Plan of Liquidation potential distributions and assists CRO with strategy and interest of various stakeholders</li> </ul>  |

| Professional           | Title             | Function   |
|------------------------|-------------------|--|
|                        |                   | <ul style="list-style-type: none"> <li>– Begins transition planning to hand over operations and bankruptcy matters post-confirmation to Liquidating Trustee</li> <li>– Serves as the liaison with UI (Buyer) on transitional services and related agreement</li> </ul>   |
| Christopher Karambelas | Managing Director | <ul style="list-style-type: none"> <li>– Chief Information Officer / Chief Operating Officer</li> <li>– Oversees and leads the migration of emails to new Mercy estate tenant</li> <li>– Addresses bankruptcy-related contractual obligation issues with vendors, conducts analysis of contract rejections, conducts high-level review of filed claims</li> <li>– Prepares for the transition of legacy human resources and IT data to the Buyer in accordance with the Transition Services Agreement</li> <li>– Prepares non-transitioning assets for liquidation/sale</li> <li>– Assists with preparation of the liquidation analysis</li> <li>– Begins transition planning to hand over operations and bankruptcy matters post-confirmation to Liquidating Trustee</li> </ul>   |
| Peg Brubaker           | Director          | <ul style="list-style-type: none"> <li>– Vice President of Human Resources</li> <li>– Oversees wind-down of human resources functions</li> <li>– Oversees wind-down of benefit plans, including the defined benefit retirement plan, termination of the 401(k), 403(b) and 457(b) plans, health and dental insurance, disability insurance, and workers' compensation</li> <li>– Responds to defined benefit pension inquiries, provides and processes pension commencement requests</li> <li>– Verifies demographic data for defined benefit pension valuation</li> <li>– Begins transition planning to hand over operations and bankruptcy matters post-confirmation to Liquidating Trustee</li> </ul>   |
| Jamy Houck             | Director          | <ul style="list-style-type: none"> <li>– Manager of Administration and Communications</li> <li>– Finalizes the monthly invoices for March and April 2024, the staffing report for April 2024, and the Compensation Report for February and March 2024</li> </ul>   |
| Kara Borodkin          | Paraprofessional  | <ul style="list-style-type: none"> <li>– Treasury and Finance Manager</li> <li>– Supports cash and liquidity management activities, including assisting with the preparation and maintenance of debtor-in-possession cash flow forecasts and variance analyses and monitoring compliance with cash collateral requirements</li> <li>– Prepares various weekly, monthly, and ad hoc financial and operational reports, including bankruptcy MOR filings, budgeting, and cash flow reports, and assists with due diligence requests from other parties, including the UCC's financial advisors, Bondholder's advisors, and Pension Committee's advisors</li> <li>– Works on Estate wind-down and bankruptcy administration items, including §503(b)(9) claims review, vendor administrative expense reconciliations, and works with counsel on the same</li> <li>– Begins transition planning to hand over operations and bankruptcy matters post-confirmation to Liquidating Trustee</li> </ul> |